

HUNTON
WILLIAMS

DOCKET FILE COPY ORIGINAL

1900 K STREET, N.W.
WASHINGTON, D.C. 20006-1109

TEL 202 • 955 • 1500
FAX 202 • 778 • 2201

RECEIVED

JUL 16 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

KIMBERLY A. NEWMAN
DIRECT DIAL: 202-778-2225
EMAIL: knewman@hunton.com

FILE NO: 46001.000278

July 16, 2001

By Hand

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *WorldCom, Cox, and AT&T ads. Verizon*
CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

Enclosed for filing on behalf of Verizon, please find four copies of Verizon's Objections to AT&T's Seventh Set of Data Requests.

Please do not hesitate to call me with any questions.

Very truly yours,

Kimberly Newman /wc

Kimberly A. Newman

cc: Dorothy T. Attwood (8 copies)(by hand)
David Levy, Esq.
Mark A. Keffer, Esq.

No. of Copies rec'd 013
List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
JUL 16 2001
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
Petition of WorldCom, Inc. Pursuant)	
to Section 252(e)(5) of the)	
Communications Act for Expedited)	
Preemption of the Jurisdiction of the)	CC Docket No. 00-218
Virginia State Corporation Commission)	
Regarding Interconnection Disputes)	
with Verizon Virginia Inc., and for)	
Expedited Arbitration)	
)	
In the Matter of)	
Petition of Cox Virginia Telecom, Inc.)	
Pursuant to Section 252(e)(5) of the)	
Communications Act for Preemption)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State)	
Corporation Commission Regarding)	
Interconnection Disputes with Verizon)	
Virginia Inc. and for Arbitration)	
)	
In the Matter of)	
Petition of AT&T Communications of)	
Virginia Inc., Pursuant to Section 252(e)(5))	CC Docket No. 00-251
of the Communications Act for Preemption)	
of the Jurisdiction of the Virginia)	
Corporation Commission Regarding)	
Interconnection Disputes With Verizon)	
Virginia Inc.)	

**VERIZON VIRGINIA INC.'S OBJECTIONS
TO AT&T'S SEVENTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (CCB rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Seventh Set of Data Requests served on Verizon by AT&T Communications of Virginia ("AT&T") on July 12, 2001.

GENERAL OBJECTIONS

1. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad and unduly burdensome.

5. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

6. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory.

7. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia. Moreover, as the Commission has assumed the jurisdiction of the Virginia State Corporation Commission in this matter, it has no jurisdiction over Verizon entities that do not conduct business in Virginia. See Memorandum Opinion and Order, In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996, CC Docket No. 00-251 (January 26, 2001).

8. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T or any other entity.

9. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are redundant of prior data requests served by AT&T.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections and without waiver of same, Verizon objects specifically to AT&T's Data Requests as follows:

ITEM: AT&T 7-1 Please identify all the tandems that VZ-VA currently has deployed in the state of Virginia and the rate centers that each tandem serves. Please distinguish between access and local tandems. Each tandem should be uniquely identified by its 11 character CLLI code. In addition, please provide the street address, city, state, zip and V&H coordinates for each tandem. In addition to other means, VZ should provide its response electronically to AT&T in spreadsheet format (e.g. Microsoft Excel Spreadsheet).

REPLY: See General Objections.

VZ VA #226

ITEM: AT&T 7-2 Please identify and list all the rate centers in which VZ-VA is authorized to provide service in the state of VA. In addition to other means, VZ should provide its response electronically to AT&T in spreadsheet format (e.g. Microsoft Excel Spreadsheet).

REPLY: See General Objections.

VZ VA #227

ITEM: AT&T 7-3 Please provide a description of the pricing methodology and/or any cost analysis and assumptions which Verizon relied upon to develop the following charges. Please include in the description, the specific costs incurred by Verizon which each of the charges are designed to recover.

- (a) Transit Service Trunking Charge
- (b) Transit Service Billing Fee
- (c) Transit Service Charge.

REPLY: See General Objections.

VZ VA #228

ITEM: AT&T 7-4 Did Verizon rely on any Tandem Transit traffic forecasts to develop its Transit Service Rates? If so, please indicate how those forecasts were used and provide the forecasts along with an explanation of the derivation of those forecasts. If not, please explain why those forecasts were not used.

REPLY: See General Objections.

VZ VA #229

ITEM: AT&T 7-5 Please provide all analysis and assumptions relied upon by Verizon to support the following thresholds associated with Transit Service charges:

- (a) the 180 day threshold and the DS-1 thresholds which are applicable to the Transit Service Billing fee
- (b) the 60 day threshold and the DS-1 thresholds applicable to the Transit Service trunking charge.

REPLY: See General Objections.

VZ VA #230

ITEM: AT&T 7-6 Please provide all analysis, studies and assumptions relied upon by Verizon in establishing the direct end office threshold of a CCS busy hour equivalent of 1 DS-1 at any time and/or 200,000 combined minutes of use for a single month, beyond which AT&T must establish POIs at the applicable Verizon end office.

REPLY: See General Objections.

VZ VA #231

Respectfully submitted,

Karen Zacharia / by permission
we

Michael E. Glover
Of Counsel

Richard D. Gary
Kelly L. Faglioni
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
(804) 788-8200

Catherine Kane Ronis
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037-1420

Of Counsel

Dated: July 16, 2001

Karen Zacharia
David Hall
1320 North Court House Road
Eighth Floor
Arlington, Virginia 22201
(703) 974-2804

Lydia R. Pulley
600 E. Main St., 11th Floor Richmond, VA
23233
(804) 772-1547

Attorneys for Verizon

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Seventh Set of Data Requests were served electronically and by overnight mail this 16th day of July, 2001, to:

Mark A. Keffer
Dan W. Long
Stephanie Baldanzi
AT&T
3033 Chain Bridge Road
Oakton, Virginia 22185
(703) 691-6046 (voice)
(703) 691-6093 (fax)

and

David Levy
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8214 (voice)
(202) 736-8711 (fax)

Constance Corry